

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 03-12499 MLW

TERRI L. PECHNER-JAMES)
and SONIA FERNANDEZ)
Plaintiffs)
)
VS.)
)
CITY OF REVERE, THOMAS)
AMBROSINO, MAYOR, CITY)
OF REVERE POLICE DEPT.)
TERRENCE REARDON, CHIEF)
OF POLICE, BERNARD FOSTER))
SALVATORE SANTORO, ROY)
COLANNINO, FREDERICK)
ROLAND, THOMAS DOHERTY)
JOHN NELSON, JAMES RUSSO)
MICHAEL MURPHY and)
STEVEN FORD)
Defendants)

ATTORNEYS FEES & COSTS FOR TERRI PECHNER-JAMES

12-12-03	Reviewed Notice of Removal mailed to the office; reviewed removal statute and examined grounds stated for Removal; reviewed client's causes of action and federal question involved	0.75
12-13-03	Checked service of process on Defendants and Sheriff's return of service; checked Plaintiff's complaint and time for answers due	0.5
12-14-03	Checked Federal removal statute; investigated grounds for seeking reversal of removal action	0.5
12-15-03	Researched answers and response deadlines; also reviewed reviewed Fed. R. Civ P. 56 (c) and Local Rules governing summary judgment	0.75
12-18-03	Reviewed Plaintiff's complaint and Exhibits A & B; reviewed administrative decisions and their findings of injury and causation	0.75

1-8-04	Checked Federal Rules of Civil Procedure for possible default of Defendants for failure to answer complaint	0.5
1-10-04	Reviewed Rule 56 (c) and Local Rule 56.1; also reviewed Rule 56(e); analyzed procedural and substantive requirements for filing a Motion For partial summary judgment	0.75
1-12-04	Reviewed purpose of summary judgment; identified claims and defenses of the Defendants that were unsupported; researched Celetox v Catrett; examined current status of discovery	1.5
1-19-04	Drafted Motion for Partial Summary Judgment on Counts 1 and 2; researched Memorandum in support of Motion	1.5
1-26-04	Researched, prepared, copied and bound exhibits to be attached in support of Plaintiff's Motion For Partial Summary Judgment	2.5
2-5-04	Prepared Motion, Exhibits and Memorandum	1.5
2-11-04	Reviewed Motion filed with the Court	0.75
2-25-04	Discussed with client the change of representation by the Defendants; discussed appearance of Reardon, Joyce & Akerson, P.C as officers for the individual Defendants	0.5
2-26-04	Reviewed Plaintiffs Motion, deadlines and time limits and Defendants requested extension	0.5
2-28-04	Reviewed late answer filed by municipal Defendants to Plaintiff's complaint	0.5
2-28-04	Reviewed Defendants answer and compared with Plaintiff's Motion for Partial Summary Judgment	0.75
3-5-04	Reviewed officers late answer to Plaintiff's complaint; reviewed Plaintiff's complaint and exhibits	0.5
3-8-04	Review of Motion to Strike filed by municipal defendants	1.5
3-8-04	Reviewed Defendants opposition to Plaintiff's Memorandum in Support of its motion	0.75

3-16-04	Reviewed documents defendants filed with the court	0.75
4-16-04	Conference with client about the effect of the removal of the case to federal court	0.75
4-23-04	Reviewed motion; prepared for hearing on Motion to be scheduled by court; reviewed administrative law and assessed value of the DALA adjudications	1.5
6-03-04	Reviewed Judge Wolf's order-Docket No:10;	0.75
6-6-04	Reviewed Fed R. Civ P. 56(f) and Local Rule 56.1.2 and other parts of Rule 56 that governs Summary Judgment motions	1.5
6-9-04	Reviewed Fed. R. Civ P. 56(f); reviewed also 56(e) and 56(g) that pertain to affidavits	1.5
6-10-04	Researched prerequisites for affidavits; researched Patterson v County of Oneida,	1.5
6-12-04	Also researched Adickes v S.H. Kress & Co; analyzed the specificity of the three prerequisites of a valid affidavit and the requirements of competency as evidence for summary judgment under Rule 56(e)	1.5
6-15-04	Researched Moore v J.B. Hunt Transport, Inc; analyzed the requirement of specific facts not conclusory statements; personal knowledge and factual basis required	1.5
6-17-04	Researched Santiago-Ramos v Centennial P/R. Wireless Corp.; examined holding which emphasized personal knowledge not restatement of complaint	1.5
6-18-04	Prepared for Conference scheduled by Judge Wolf for 6-24-04	1.5
6-20-04	Reviewed Certifications pursuant to Local Rule 16.1	0.5
6-22-04	Reviewed Joint Statement and order canceling 6-24-04 conference	0.5
6-29-04	Prepared Rule 16.1 certifications for Plaintiff for filing with court	0.5
8-20-04	Reviewed Request for Production of Documents from counsel for individual officers	1.5

8-21-04	Examined request and documents demanded by Defendants	3.5
8-22-04	Reviewed medical and other records provided by Plaintiff made selection to comply with request of Defendants	3.5
8-24-04	Organized records; prepared list of records found; and prepared response to Defendants	3.5
9-22-04	Reviewed Plaintiff's case in preparation for conference on 9-24-04	1.5
9-24-04	Attended conference; reviewed schedule with court; presented theory of case and merits of client's facts	1.5
9-25-04	Reviewed Plaintiff's complaint and the decisions of DALA; also reviewed the administrative decisions and their findings on injury and causation	1.5
9-26-04	Review of Schedule established by court; amended pleadings by 10-8-04; pretrial for 11-17-05; trial date 11-25-05	0.75
9-29-04	Reviewed Plaintiff's case for purposes of amending pleadings; reviewed administrative decisions since date of filing	1.5
10-8-04	Reviewed pleadings for purposes of amendment; researched preclusive effect of administrative decisions in lieu of amendment	1.5
10-18-04	Reviewed Interrogatories served upon Plaintiff; evaluated questions, prepared responses	4.5
10-25-04	Reviewed Document request, evaluated request, identified documents requested, prepared responses	4.5
10-29-04	Reviewed Court's termination of Defendant's motion to strike; motion moot in light of Judge's decision	0.75
2-14-05	Reviewed client's case and docket entries; notified client that the City had new counsel; also notified her of developments in the case	1.5
2-22-05	Review of Local Rule 7.1 and City's Motion for Summary Judgment filed by Terrence Reardon	1.5
2-24-05	Reviewed and analyzed Statement of Facts attached to Motion;	

	examined Terrence Reardon's version of facts	0.75
3-1-05	Reviewed Terrence Reardon's Motion for Summary Judgment as filed with the court, reviewed exhibits Filed with Motion	1.5
3-4-05	Reviewed Terrence Reardon's motion, exhibits and additional exhibits	0.75
3-8-05	Extensive review of 10 Exhibits submitted by Reardon; analyzed each exhibit for relevance to Plaintiff's case	1.5
3-16-05	Office conference with associate about Motion by Terrence Reardon and Stipulated Motion Permitting Service of Written Interrogatories Exceeding 25 in Number; reviewed the number of interrogatories that Exceeded 25; read 179 interrogatories	2.5
3-18-05	Reviewed Fed R. Civ. Procedure on Interrogatories	1.5
3-25-05	Researched response to Defendants excessive number of interrogatories	0.75
3-24-05	Reviewed Judge's endorsement of Stipulated Motion; prepared Plaintiff's response to Terrence Reardon's Motion for Summary Judgment	2.5
4-1-05	Drafted document designed to reduce number of interrogatories; prepared Emergency Motion For Protective Order & Request for Hearing; researched number of Interrogatories permitted by rules; determined lack of Support for excessive interrogatories	1.5
4-10-05	Prepared final draft of emergency motion	0.75
4-12-05	Drafted Motion To Compel Production of Documents	1.5
4-12-05	Prepared Exhibits for attachment to motion	0.75
4-14-05	Reviewed Exhibits for Emergency Motion	1.5
3-10-05	Prepared draft Opposition to Summary Judgment Motion of Terrence Reardon	1.5

3-12-05	Researched memorandum in support of opposition	1.5
3-13-05	Completed final version of Opposition	0.75
4-13-05	Reviewed Summary Judgment Motion by Defendant, Thomas Ambrosino	1.5
4-13-05	Reviewed Affidavit of counsel-Walter Porr; analyzed Affidavit for personal knowledge and counsel's ability To testify to content of Affidavit; also reviewed other Attachments	1.5
4-14-04	Reviewed City's Opposition to Plaintiff's Motion to Compel Discovery-Docket No:40	0.75
4-15-05	Reviewed City's Opposition to Docket No;33-Plaintiffs Emergency Order; review of Federal Rules of Procedure 37 and Authors Notes	1.25
4-15-05	Reviewed Affidavit filed by City	0.5
5-9-05	Reviewed unsolicited Status report filed by City	1.5
5-23-05	Reviewed City's Motion to compel Answers to Interrogatories	1.5
5-23-05	Reviewed Affidavit of Counsel-Walter Porr; reviewed Rule 56 on requirements of affidavits;	0.75
5-23-05	Reviewed Certificate of Consultation and other documents filed by Walter Porr	1.5
5-24-05	Reviewed unsolicited Status Report and Request For Further Scheduling Conference filed by the City	2.5
5-25-05	Researched the Rooker Feldman doctrine and its applicability to this case;	1.5
5-26-05	Read and researched Rooker case	1.5
5-26-05	Read and researched Feldman case	1.5
5-27-05	Examined the jurisdictional implications of Rooker-Feldman	1.5
5-28-05	Review of the issue of jurisdiction and retrying state adjudications in federal courts	3.5

5-28-05	Reviewed issue of comity and the case law pursuant to Sec 1783	1.5
6-29-05	Reviewed Motion by the City to seek Leave to file a Memorandum in excess of twenty pages to support their motion; prepared response	1.5
6-30-05	Reviewed Supplemental Status Report and Request for Further Scheduling filed by City; reviewed Federal and Local Rules On the requirement and procedures that govern unsolicited Status reports	1.5
6-29-05	Reviewed Certificate of Consultation on Memo in excess of 20 pages; reviewed Local Rule and content of Certificate	0.75
6-28-05	Prepared Request for Rooker-Feldman Ruling and Request for Further Instructions for filing with court	1.5
6-29-05	Reviewed facts, arguments, history and case law in support of Rooker-Feldman memo	1.5
6-29-05	Review of contents of Certificate of Consultation for Rooker-Feldman Request	0.5
6-30-05	Reviewed City's Motion for Relief from time Limits	1.5
7-1-05	Examined City's proposed Opposition to Rooker-Feldman; examined Affidavit of Walter Porr and its compliance with the requirements of competent affidavits; reviewed attachments provided	2.5
7-1-05	Prepared Opposition to City's Motion for Relief from Time Limits;	1.5
7-1-05	Prepared Plaintiff's Opposition to Ambrosino's Motion For Summary Judgment	1.5
7-6-05	Reviewed Opposition that City filed to Rooker-Feldman; reviewed docket entries and documents filed in connection with Rooker-Feldman	1.5
7-8-05	Drafted Plaintiff's Opposition to No:59-Motion for Relief from time Limits	0.75
7-8-05	Researched, prepared and filed Plaintiff's Opposition to Ambrosino's Summary Judgment Motion	1.5

7-13-05	Reviewed City's Motion To Strike Plaintiff's Opposition To Ambrosino's Summary Judgment motion and drafted opposition	1.5
7-13-05	Drafted opposition to No:63 and to City's Motion to Strike	1.5
7-14-05	Review of Opposition to Rooker-Feldman filed by Counsel for officers	1.5
7-21-06	Reviewed documents filed with Court in Opposition to Rooker-Feldman	0.75
7-21-05	Review of docket and contents of Certificate of Consultation for Nos 61 and 64 filed by the City	0.75
7-29-05	Reviewed Notice of Hearing on Docket Nos. 53, 31, 46, 34, and 59 scheduled for September 23, 2005	
7-30-05	Prepared Plaintiff's position on docket nos 53, 31, 46	1.5
7-30-05	Prepared Plaintiff's position on docket nos 46, 34, and 59	1.5
8-1-05	Reviewed letter from Walter Porr sent to Clerk about 9-23-05 hearings;	0.5
8-2-05	Reviewed Motion filed by City for Rule 11 Sanctions;	1.5
8-2-05	Reviewed Affidavit of Walter Porr; reviewed requirements of Affidavits pursuant to the Federal Rules of Procedure	1.5
8-2-05	Reviewed Certificate of Consultation, checked content	0.75
8-5-05	Researched and drafted Plaintiff's Supplemental Memorandum in Support Rooker-Feldman; analyzed new cases	1.5
8-10-05	Researched, drafted and finalized and filed Plaintiff's Supplemental Memorandum in support of Rooker-Feldman	2.5
8-11-05	Reviewed City's Motion To Strike Plaintiff's Rooker-Feldman supplemental memo	1.5
8-15-05	Drafted Plaintiff's Motion For Rule 11 Sanctions; drafted Opposition to Defendants Motion for Rule 11 sanctions; Reviewed docket entries for evidence of Rule 11 violations	2.5
8-18-05	Reviewed filing of Defendants Motion to Strike Rooker-Feldman memo, motion to strike Plaintiff's motion for sanctions; reviewed	

	respective affidavits of Walter Porr, reviewed Federal rules re: requirements of competent affidavits	4.5
8-19-05	Reviewed content of Defendants Certificate of Consultation	0.75
9-7-05	Reviewed Defendants Motion To Compel Production And Award of Expenses; also reviewed 16 Exhibits filed with Motion	3.5
9-9-05	Prepared draft of Opposition To Motion To Compel; Researched exhibits to support Motion	2.5
9-13-05	Reviewed Motion filed with Court and Certificate of Consultation	1.5
9-19-05	Reviewed Notice of 9-23-05 hearing cancelled; reviewed docket entries for pending motions; new hearing scheduled for 10-26-05	1.5
9-25-05	Researched, prepared for filing Opposition to Motion to Compel Production of Documents by Defendants	3.5
9-26-05	Filed Opposition to Motion to Compel	0.75
9-26-05	Prepared and filed Affidavit of Opposition to Defendant's Motion	1.5
9-27-05	Prepared for hearing on all pending motions; hearing scheduled for 10-6-07; reviewed docket entries and documents linked; reviewed the motions filed by Chief Reardon and Mayor Ambrosino in particular; also Plaintiff's defense against said motions	2.5
9-28-05	Reviewed Gonsalves v City of New Bedford; compared Mayor John Bullard of New Bedford with Mayor Ambrosino of Revere; Compared Chief Benoit of New Bedford with Chiefs Russo, Colannino and Chief Reardon of Revere	1.5
10-5-05	Prepared notes on municipalities with Plan B charters; reviewed personal liability of subordinate officers; reviewed the various bases of municipal liability analyzed by Judge Wolf in Gonsalves	1.5
10-7-05	Attended first Motion hearing with Magistrate Judge Sorokin; addressed court on list of motions to be heard; noted court instructions about Plaintiff consenting to trial; addressed court and met with counsel to discuss schedule; addressed court in opposition to both Defendants motions	4.5

10-12-05	Reviewed docket entries; examined Docket No:86; Judge Wolf referred case to Magistrate Sorokin for full pre-trial purposes; also reports and recommendations	0.75
10-12-05	Examined Magistrate's discovery order and status conference scheduled for November 22, 2005	0.5
10-12-05	Reviewed magistrate's Report and Recommendation on Motions filed by Defendants Reardon and Ambrosino in docket nos:29 and 37; read magistrate's recommendations in both cases; reviewed Rule 72	4.5
10-13-05	Reviewed docket for date of objections-10-26-05; reviewed Rule 72 of Fed Rules and Local Rule 72 for time deadlines and Appeal and Objection procedures	1.5
10-14-05	Reviewed Fed R.Civ.P 72(a) and determined appeal procedure for Magistrate's decision on both motions	1.5
10-15-05	Researched Phinney v Wentworth Douglas Hospital; examined the content of objections to Magistrate's order pursuant to Rule 72(a); read magistrate's decisions; read Gonsalves; read cases cited in Gonsalves; analyzed the theory of municipal liability; prepared draft of motion for de novo review of magistrate's order in docket no:87	3.5
10-16-05	Researched Bardonoro and other cases cited in Gonsalves; shepardized cases in Gonsalves and researched new cases on municipal liability;	2.5
10-17-05	Researched the documents attached to the Defendants motion for summary judgment; selected Mayor Ambrosino's Letter of Appointment to Chief Reardon and documents that supported municipal liability under Plan B charter	1.5
10-18-05	Researched statutes relevant to Plan B charter cities and examined all attachments, including Statement of Facts provided by Defendants, that support the theory of municipal liability	2.5
10-20-05	Filed timely Objection to Magistrate's Non-dispositive Order on Defendants Motion To Dismiss; filed timely request For de novo review of other matters; attached relevant Exhibits	1.5
10-19-05	Reviewed Memorandum on Municipal Liability and	

	exhibits referenced in documents; filed document	1.5
10-24-05	Reviewed City's Opposition to Plaintiff's Objection and Motion for de novo appeal;	1.5
10-25-05	Reviewed Officers Reply and Opposition to Plaintiff's Objection and Motion for de novo review	1.5
11-1-05	Read and analyzed 179 interrogatories propounded by Defendants on Plaintiff; extensive review of files	4.5
11-2-05	Organized interrogatories and researched materials that contained information required to respond	4.5
11-3-05	Drafted responses for interrogatories 1 through 40	4.5
11-4-05	Drafted responses for interrogatories 41 through 80	4.5
11-5-05	Drafted responses for interrogatories 81 through 120	4.5
11-6-05	Drafted responses for interrogatories 121 through 150	3.5
11-7-05	Drafted responses for interrogatories 151 through 179	2.5
11-15-05	Reviewed Plaintiffs answers to interrogatories; compared this Plaintiff's responses with coPlaintiff's responses to determine consistency on the hostility of the environment	1.5
11-22-05	Conducted docket review; prepared for hearing and scheduling issues to be held on 11-29-05	0.75
11-24-05	Reviewed City's second opposition to Plaintiff's Objection and motion for de novo review; reviewed docket Nos 90 and 91; reviewed Magistrate's non-dispositive orders; reviewed Plaintiff's objection and request for de novo review; prepared counter argument to latest opposition	3.5
11-29-05	Status conference held in Courtroom 14; counsel appeared in court on behalf of Plaintiff; discussed modified order; addressed court on written deadline 12-6-05 for discovery; deposition deadline 3-31-06; Rule 56 motions by 5-31-06; next status conference for 3-27-06; preparation for conference; conference with client	1.5

12-1-05	Read and analyzed documents City filed with the court; read and analyzed Affidavit of Walter Porr and Exhibits A-F; reviewed requirements of competent affidavits	1.5
12-5-05	Reviewed written discovery prepared to be sent to Mayor Ambrosino and Chief Reardon	2.5
12-6-05	Prepared Plaintiff's response to City's Opposition; reviewed Docket No: 94 and analyzed arguments made by City	1.5
12-8-05	Reviewed documents prepared for Plaintiff's response to City's Opposition	0.75
12-15-05	Researched discovery prepared for Defendants in light of the theory of municipal liability; analyzed the standards of deliberate indifference and the definition of policy maker used in Gonsalves.	2.5
12-20-05	Review of docket entries; examined affidavits submitted by Walter Porr and the motions and oppositions filed since Last hearing.	1.5
12-21-05	Prepared and filed objection to No:94; researched and prepared and submitted exhibits in support of Plaintiff's Objection to No: 94	4.5
12-28-05	Reviewed Motion for Sanctions and Award of Expenses filed by officers; examined exhibits A-F filed with Motion	1.5
1-4-06	Reviewed Motion and Exhibits filed with the court as Docket No: 100; researched docket entries and case law; analyzed Expenses claimed by Defendants; researched response	3.5
1-9-06	Compared Motion for Sanctions filed by the City with Motion for Sanctions filed by the officers; Docket No:100 and 101	1.5
1-9-06	Examined Affidavit of Walter Porr and Exhibits filed by Walter Porr for Docket No: 100; researched requisites for Competent affidavit; analyzed content of affidavit	1.5
1-10-06	Attended deposition of Plaintiff; prepared Plaintiff for deposition; responded to Plaintiff's inquiries during deposition; conferred with Plaintiff after deposition; prepared for next deposition	8.5

1-11-06	Researched and prepared Opposition to City's motion for sanctions	4.5
1-12-06	Researched and prepared Opposition to officers' motion for sanctions	4.5
1-12-06	Researched statutory requirements of Sec 1292(b); analyzed the grounds and substantive nature of interlocutory appeal; researched procedural requirements for Sec 1292(b) appeal; also reviewed documents prepared in support of appeal; researched case law governing role of district judge and consideration of appeal	6.5
1-14-06	Reviewed and checked details of request for certification of question of jurisdiction for interlocutory appeal; checked statute, regulations, procedural rules in preparation for filing	2.5
1-23-06	Reviewed and filed Plaintiff's Opposition to City's Motion for Sanctions; reviewed and filed affidavit of counsel	1.5
1-23-06	Reviewed and filed Plaintiff's Opposition to Officer's Motion For Sanctions; reviewed	1.5
1-23-06	Reviewed and filed Plaintiff's Sec. 1292(b) request for certification of interlocutory appeal	1.5
1-24-06	Reviewed all interrogatories, identified responses accepted; identified responses rejected; prepared additional responses; reviewed 179 responses for completeness	1.5
1-25-06	Attended court hearing at 2:00 pm; addressed court's concern about interrogatories; reached consensus with court to resolve disputed interrogatories; discussed with client need for signatures; reviewed dates-1-27-06 for signatures; 2-7-06 for amended responses to interrogatories; Plaintiff's counsel withdrew its motion for sanctions	2.5
1-26-06	Reviewed Supplemental Memorandum by City; reviewed original motion No: 101; also examined exhibits filed with Supplemental Memorandum	2.5
1-27-06	Prepared and filed releases for records and mailed them to providers; prepared response to interrogatories required by court order	1.5
1-30-06	Reviewed Magistrate's order; examined documents filed for	

	compliance with order	1.5
2-2-06	Examined Exhibits filed by Walter Porr on Docket No:111; examined Walter Porr's exparte motion; also examined Local Rules and its provisions on Ex Parte motions	0.75
2-3-06	Reviewed rules of procedure that govern interrogatories; reviewed court's action on City's Exparte Motion; reviewed docket entries and Court's order re: interrogatories	1.5
2-4-06	Reviewed City's Ex Parte Motion and modification requested; reviewed exhibits attached to motion;	0.75
2-8-06	Reviewed order of 2-6-06; reviewed Plaintiff's 179 interrogatories; examined all revised answers; examined documents for signature under oath and other prerequisites	2.5
2-8-06	Reprinted Plaintiffs 179 original responses; reprinted subsequent responses; compared responses and implemented court requirements	4.5
2-9-06	Prepared releases for Plaintiff's medical and psychiatric records; copied releases; mailed releases to providers and to counsel for Defendants	4.5
2-10-06	Prepared new set of interrogatories for Plaintiff and in compliance with order; checked documents for factual completeness	1.5
2-10-06	Prepared responses; copied responses; mailed copies to counsel; filed responses electronically with court	3.5
2-10-06	Reviewed, and sent to court prepared supplemental memorandum	4.1
2-13-06	Reviewed Memorandum filed by the City; also reviewed reviewed Motion filed by the Officers seeking sanctions against the Plaintiff's counsel	2.5
2-17-06	Reviewed court order in Docket No: 115; prepared motion for reconsideration; prepared attachments; mailed to defendants counsel and subsequently filed with city	5.5
2-11-06	Researched Fed R. Civ P. 56; analyzed the standards for	

	summary judgment; read and analyzed Celotex v Catrett and other cases; reviewed Rule 56 (c) for summary judgment on liability alone	2.5
2-11-06	Drafted and prepared motion for summary judgment on less than all issues; included legal basis for motion	2.5
2-12-06	Reviewed DALA, PERAC and other administrative decisions rendered since filing of complaint; reviewed findings of fact, conclusions of law; also reviewed the plaintiff injury and disability and its causation	3.5
2-12-06	Prepared argument for summary judgment on Count 1 of the Plaintiff's complaint	2.5
2-13-06	Examined facts of Plaintiffs case; compared facts that supported constructive discharge in Suders with facts adjudicated in Plaintiff's case	3.5
2-13-06	Read and analyzed Pennsylvania State Police v Suders and examined the requirements and defenses available for constructive discharge; prepared argument for summary judgment on Count II-constructive discharge	3.5
2-14-06	Prepared Plaintiff's Affidavit; Statement of Facts; reviewed events included in affidavit, reviewed Statement of Facts provided by both Mayor Ambrosino and Chief Reardon; selected fact to be included in Plaintiff's Statement of facts	2.5
2-14-06	Researched cases on summary judgment; researched cases on administrative law; drafted memorandum in support of Plaintiff's Motion For Summary Judgment	4.5
2-15-06	Selected, copied and organized Exhibit List in support of Plaintiff's case; arranged for scanning of exhibits that needed Scanning;	2.5
2-16-06	Prepared material to be included in Certificate of Compliance; reviewed motion, memorandum and exhibits; checked accuracy of Certificate; prepared notice of filing and cover letters	2.5

2-24-06	Reviewed and filed Motion for Reconsideration and exhibits	0.75
2-28-06	Reviewed status report by City and attachments	0.75
2-24-06	Reviewed and filed Motion for Reconsideration of Sanctions; reviewed actions taken by Plaintiff to comply With court's order	1.5
2-20-06	Made copies of Summary Judgment motion, memorandum, cover letters, attachments; collated and organized packages	3.5
2-24-06	Responded to many demands from Walter Porr for withdrawal of Motion	1.5
2-28-06	Filed Docket Nos: 118 through 124 with court; final review of pleadings	1.5
3-1-06	Reviewed Unsolicited Status Report filed by officers: No:117	1.5
3-1-06	Reviewed document requests and requests for medical and psychiatric records in preparation for 3-3-06 hearing; reviewed all compliance efforts of Plaintiff.	2.5
3-2-06	Reviewed Docket No 125; reviewed Plaintiff's request for reconsideration; City's opposition and status of the discovery process; prepared for hearing on 3-3-06; reviewed Rooker Feldman request; reviewed Sec 1292(b) request	3.5
3-3-06	Reviewed Plaintiff's interrogatories; prepared Plaintiff for attestation; examined medical releases prepared by Plaintiff; examined releases prepared by Defendants counsel; discussed Defendants releases with Plaintiff; reviewed protective order Prepared by Defendants with Plaintiff;	3.5
3-3-06	Presented arguments on Rooker-Feldman; presented arguments Sec 1292(b) request	0.75
3-6-06	Reviewed Magistrate's Fourth Discovery Order; checked record with events of hearing; Docket Nos: 108 and 109 withdrawn; date for expert disclosures 3-30-06; court's decision on sanctions; next hearing scheduled for 4-11-06; analyzed docket entries in preparation for next hearing	1.5
3-8-06	Reviewed Notice of Consultation by Walter Porr re:Opposition to Plaintiff's Motion for Summary Judgment On Less than	

	All Issues	0.75
3-9-06	Reviewed City's Objection to Plaintiff's Motion for Summary Judgment; analyzed City's argument; examined and researched Cases cited.	1.5
3-10-06	Reviewed City's Objection to Plaintiff's Affidavit-Exhibit 18; researched requirement of competent affidavits; examined objections made by City	1.5
3-11-06	Reviewed City's Objection to Plaintiff's Statement of Material Facts-filed as No:122; examined Statements of Material Facts Filed by Mayor Ambrosino and Chief Reardon; reviewed materials that supported Plaintiff's statement	2.5
3-11-06	Reviewed Affidavit of Walter Porr; reviewed each of twelve exhibits filed by Walter Porr with affidavit; reviewed the Federal Rules for proper form of Affidavit; examined information pertinent to Plaintiff	3.5
3-12-06	Reviewed Plaintiff's deposition of 1-10-06; prepared for deposition scheduled for 3-14-06; read Plaintiff's complaint in preparation; reviewed documents both medical and psychiatric	2.5
3-14-06	Attended deposition of Plaintiff; prepared Plaintiff for deposition; responded to Plaintiff's inquiries during deposition; conferred with Plaintiff after deposition; prepared for next deposition;	8.5
3-14-06	Reviewed conduct of deposition; reviewed document used by Defendants in deposition	1.5
3-15-06	Reviewed documents filed by Walter Porr in opposition to the Plaintiff's Motion for Summary Judgment; reviewed documents and objections specifically directed to Plaintiff; compared documents and objections with Certificate of Consultation and documents provided therewith	2.5
3-15-06	Review of Cross Motion for Judgment on the Pleadings filed by the City; compared Cross Motion with City's Opposition to Motion for Summary Judgment;	2.5
3-15-06	Researched Rule 12 on Defendants Cross Motion; researched and prepared Opposition and Exhibits to City's motion.	3.5
3-20-06	Review of Judge Wolf's Order and written Memorandum	

	in Docket No: 136; analyzed text of Memorandum and Order	1.5
3-20-06	Researched Judge Wolf's Order & Memorandum and cases cited therein; examined docket nos 29 and 37; assessed case in light of the denial of the Defendants motion for Summary Judgment.	2.5
3-21-06	Reviewed City's Amended (Cross)Motion for Judgment on the Pleadings; reviewed Motion and Amendment; analyzed both Motions; researched and drafted response	1.5
3-22-06	Reviewed additional City Motion for Partial Summary Judgment; Researched and Prepared response to City's additional Motion; Compared City's Cross Motion with Motion for Partial Summary Judgment;	2.5
3-23-06	Prepared and filed Opposition to Cross Motion; prepared and filed Opposition to Motion for Partial Summary Judgment;	3.5
3-24-06	Prepared and filed Motion for Extension of Time to File Response to Expert Reports and Disclosures	1.5
3-27-06	Reviewed Opposition filed by Walter Porr to Extension of time to filed Reports	0.75
3-27-06	Reviewed Plaintiff's documents in Motion for Summary Judgment; examined Walter Porr's Supplemental Affidavit; Also reviewed attachments	1.5
3-31-06	Prepared and filed Plaintiff's Opposition to City's Motion for Partial Summary Judgment	2.5
3-31-06	Reviewed City's Memorandum in Opposition to Plaintiff's Opposition to No: 146; reviewed Plaintiff's pleading and City's Memorandum in opposition	3.5
3-31-06	Prepared, filed and researched Motion for Leave to file Expert Witness Information; organized qualifications and Attachments	1.5
4-3-06	Organized medical and psychiatric records provided by Dr. Keroack; separated records that belonged to Plaintiff's Husband from records that belonged to Plaintiff	3.5
4-4-06	Prepared Motion for In-Camera Examination of Records; drafted request that court identify admissible records since	

	Plaintiff's husband was not a party to suit; prepared, Copied and filed Motion with court	2.5
4-4-06	Prepared Certificate of Service and Certificate of Consultation	0.5
4-5-06	Reviewed City's Opposition to In Camera Inspection	1.5
4-6-06	Reviewed City's response to Plaintiff's Request for In Camera Examination; prepared for hearing on 4-11-06 Scheduled by court;	2.5
4-6-06	Examined content of Affidavit of Walter Porr; researched the requirements of Affidavits; analyzed the content of Docket No: 13; prepared motion to strike; also reviewed Rule 56 and Local Rule 56.1; compared content of Affidavit with requirements of procedural rules.	3.5
3-28-06	Researched Rule 56 and Local Rule 56.1; analyzed the procedural requirement insufficiency of mere denials and the requirement of specific facts; examined Affidavit of Walter Porr for "specific facts".	3.5
3-28-06	Reviewed Memorandum in Support of Request for Admissions	1.5
3-29-06	Prepared for deposition on 4-7-06; read prior deposition	2.5
4-7-06	Attended deposition of Plaintiff, Terri Pechner-James	6.5
4-7-06	Review of facts of the case with associate prior to deposition	1.5
4-8-06	Reviewed City's Opposition to Plaintiff's Request for Admissions; examined documents filed by Walter Porr	0.75
4-9-06	Reviewed 4 th Status Report by City; reviewed City's Opposition to Request for Admissions	1.5
4-10-06	Reviewed all pending motions and medical records in preparation for hearing on 4-11-06;	1.5
4-10-06	Reviewed additional Status Report filed by Counsel for the officers; analyzed facts contained in report	0.75
4-10-06	Reviewed City's Motion for Rule 11 Sanctions; also reviewed Attachments, Exhibits & Affidavits of Walter Porr;	0.75

4-10-06	Researched and drafted Plaintiff's Opposition to City's Amended Motion for Judgment on the Pleadings	1.5
4-11-06	Attended conference scheduled for 4-11-06; addressed the privacy issues of Plaintiff's husband's medical records; discussed stipulation; court approved protective order; addressed other motions including discovery motions before court	1.5
4-12-06	Implemented court order with regard to records; reviewed Omnibus Discovery Order And Status Report; reviewed all Interrogatories, Requests for Production and other discovery Served by Plaintiff on Defendants	2.5
4-12-06	Selected the discovery documents that Plaintiff served on the City; researched the discovery that was answered and the discovery that remained unanswered; chose documents to be filed Before 4-19-06	1.5
4-13-06	Drafted Interrogatories, Request for Production of Documents and other discovery to Defendants from Plaintiff	4.5
4-20-06	Filed with the court the discovery ordered	1.5
4-21-06	Reviewed status report filed by officers; examined allegations made against Plaintiff	1.5
4-24-06	Read and analyzed unsolicited Memorandum of Law filed by City; examined Omnibus Order and Plaintiff's Response	2.5
4-25-06	Read Protective Order; returned the records to Mark James as directed by the court; served court with notice of compliance	1.5
5-1-06	Reviewed Order on Plaintiff's Request To Enlarge The Period for Discovery; examined court's allowance to the Defendants, Reardon and Ambrosino to respond to discovery Received before December 6, 2005 within 20 days from 5-21-06	0.75
5-2-06	Reviewed docket entries; researched contents of City's unsolicited Memorandum of Law-Docket No: 174; prepared to refute statements on discovery in future pleadings	1.5
5-5-06	Attended Deposition with Plaintiff; preparation for deposition travel to deposition;	4.5

5-5-06	Consulted with Plaintiff during deposition; reviewed topics covered during deposition	3.5
5-6-06	Reviewed Plaintiff's complaint and exhibits, also reviewed topics covered during deposition	2.5
5-8-06	Reviewed Motion filed by City seeking sanctions based on deposition of 5-5-06; examined exhibits of Walter Porr	2.5
5-8-06	Examined Affidavit of Paul Capizzi filed with this Motion; researched requirements of affidavits; analyzed Capizzi's affidavit	1.5
5-8-06	Examined Affidavit of Walter Porr filed with Motion; researched requirements of affidavits, analyzed Walter Porr's affidavit for specific facts that affect Plaintiff	1.5
5-8-06	Examined Certificate of Consultation filed with Motion	0.75
5-8-06	Consulted with counsel on revised deposition schedules	0.75
5-8-06	Reviewed Judge Wolf's ruling in Docket No: 136; reviewed Magistrate's denial of discovery in No: 181; researched basis Of appeal; researched history of docket entries; identified the Date of first deposition	2.5
5-9-06	Drafted and filed Appeal of 181, researched cases cited in Notice of Appeal; researched Exhibits attached to Notice Of Appeal	2.5
5-10-06	Reviewed and filed notice of appeal	1.5
5-11-06	Reviewed Docket No: 188 and Sanctions requested; examined sanctions specifically requested against Plaintiff; read an analyzed allegations made by Walter Porr in Motion; examined 8 exhibits attached to motion	2.5
5-11-06	Reviewed Affidavit of Walter Porr and its exhibits; analyzed the requirements of competent affidavits; examined certificate of consultation filed with Motion	1.5
5-15-06	Reviewed Memorandum of Law filed by the City in opposition to the Plaintiff's Appeal of Magistrate's decision; prepared response for argument at next hearing	1.5

5-17-06	Examined unsolicited Joint Status Report filed both set of counsel; prepared response for next hearing	1.5
5-18-06	Examined City's Certificate of Consultation; supplemental memorandum; supplemental affidavit of Walter Porr; examined requirements of affidavits and Content of Affidavit by Walter Porr; analyzed necessity Of supplemental affidavit and supplemental memorandum By Walter Porr	3.5
5-18-06	Researched, prepared and filed response to City's Motion at Docket No: 188; Plaintiff's response recorded at No:197	4.5
5-19-06	Reviewed Unsolicited Status Report for facts specific to the Plaintiff; examined exhibits filed in connection with Report	1.5
5-19-06	Prepared for deposition and traveled to deposition site	3.5
5-19-06	Attended deposition with Plaintiff; advised and consulted with Plaintiff during deposition	6.0
5-19-06	Reviewed conduct of deposition after session	1.5
5-20-06	Reviewed Plaintiff's entire deposition of 5-5-06; reviewed the questions of Walter Porr about abortions, miscarriages and sexual relationships at the senior prom; also reviewed the Motions filed by Walter Porr	5.5
5-21-06	Reviewed Exhibits attached to No: 188; identified that Defendant's counsel asked several thousand questions During prior deposition; identified questions that Plaintiff Properly refused to answer; addressed in document prepared For the court, the propriety and necessity of the sanction Requested by the Defendants	3.5
5-22-06	Addressed deposition and discovery issues specific to Plaintiff; requested that the Court seal No: 191, the deposition of 5-5-06; exhibit B of No: 188 that contains the detailed sexual questions of Walter Porr; advised client that court had advised client to refrain from inquiring into Plaintiff's sexual relationship absent prior approval of the court	2.5
5-23-06	Reviewed Electronic Clerk notes of hearing; noted next hearing	

	date of 6-27-06; prepared for extended discovery schedule	0.75
5-25-06	Reviewed last deposition and orders from hearing on 5-22-06; prepared for deposition	2.5
5-25-06	Attended deposition with Plaintiff; advised and consulted with Plaintiff during deposition	6.0
5-25-06	Reviewed conduct of deposition after session	1.5
5-26-06	Reviewed Defendants compliance with discovery orders	0.75
5-27-06	Reviewed Motions To Compel Defendants, Reardon and Ambrosino to respond to discovery; reviewed Plaintiff's Discovery	2.5
5-30-06	Reviewed Unsolicited Status Report filed by Officers with attached Exhibits; prepared response for hearing on 6-27-06	1.5
5-30-06	Prepared for deposition; traveled to deposition site	3.5
5-30-06	Attended deposition; consulted with Defendants counsel; advised and consulted with Plaintiff during deposition; reviewed mini copies of Plaintiff's prior deposition	6.0
5-30-06	Reviewed conduct of deposition after session	1.5
5-30-06	Compared deposition with the depositions conducted by Defendants on 5-5-06 and 5-25-06	1.5
5-31-06	Reviewed City's Memorandum of Law; examined exhibits filed with Memorandum by Walter Porr; read prior depositions; prepared response for next hearing	2.5
5-31-06	Prepared and filed Plaintiff's Motion to Compel Defendants, Reardon and Ambrosino to Answer Discovery ordered by Court;	2.5
6-1-06	Reviewed Plaintiff's Discovery served on Defendants; reviewed orders of court; reviewed expired timetable; reviewed non-compliance of Defendants; examined Defendants objection to Plaintiff's Motion to Compel their willful non-compliance	2.5
6-1-06	Reviewed Affidavit of Walter Porr; analyzed requirements of affidavits; analyzed unsubstantiated rationale for non-compliance	0.75

6-7-06	Prepared for deposition and traveled to deposition site	3.5
6-7-06	Attended deposition; consulted with Defendants counsel; advised and consulted with Plaintiff during deposition; reviewed mini copies of Plaintiff's prior deposition	6.0
6-7-06	Reviewed conduct of deposition after session	1.5
6-7-06	Compared deposition with the depositions conducted by Defendants	1.5
6-14-06	Researched the basis of the Defendant's Second Memorandum in support of Motion Against Plaintiff: No:188; analyzed 13 exhibits filed by Walter Porr; prepared response to Second Memorandum;	2.5
6-15-06	Examined Defendants arguments that support 6 th Unsolicited Status Report and attachments filed by the City; prepared response to Report	3.5
6-22-06	Prepared for deposition and travel to deposition site	3.5
6-22-06	Attended deposition; consulted with Defendants counsel; advised and consulted with Plaintiff during deposition;	5.5
6-22-06	Reviewed conduct of deposition after session	1.5
6-22-06	Compared this final deposition with prior depositions; analyzed arguments and calculations made by Walter Porr seeking further depositions of the Plaintiff	2.5
6-24-06	Compared Defendants 3 rd Memorandum with Defendants 2 nd Memorandum; examined exhibits attached to 2 nd Memorandum To exhibits attached to 3 rd Memorandum; prepared notes on the Defendants abuse of Local Rule 7.1 and other Motion rules	2.5
6-26-06	Compared Status Report and Attachments filed by Defendant Officers with Memorandums and attachments filed by City	1.5
6-26-06	Prepared and filed Objection to 6 th Unsolicited Status Report filed by the City; prepared Affidavit of Counsel in support of Objection	2.5
6-27-06	Researched 6 th Status Report and Attachments; prepared notes on the City's abuse of the Federal Rules and the Local Rules of Motion Practice	2.5

6-30-06	Researched deposition schedule; reviewed Docket No 188; also researched City's Second Memorandum, City's Third Memorandum; also researched City's 6 th Unsolicited Status Report;	3.5
6-30-06	Analyzed facts of Nos: 188 and 209 that have been rendered moot by the depositions and actions of the court; prepared and filed Plaintiff's response to Defendants	2.5
6-30-06	Prepared Appendix and Exhibits that support Plaintiff's response	1.5
7-2-06	Researched Relation Back doctrine; prepared for its use on Plaintiff's pleadings	1.5
7-8-06	Reviewed City's Motion To Strike; also reviewed City's response to No: 217 and exhibits; prepared motion to compel Defendants to Respond to Pleadings ordered by the court	3.5
7-8-06	Prepared memorandum and certificate of consultation for filing with Plaintiff's motion; prepared exhibits that demonstrated City's non-compliance	2.5
7-14-06	Reviewed Motion for Sanctions filed by Officers; examined exhibits; prepared response	2.5
7-17-06	Reviewed number of depositions ordered by the court; calculated number of depositions completed by the Plaintiff; examined Plaintiff's conduct for compliance	1.5
8-17-06	Reviewed Docket No: 188 and Docket No: 182; also researched Federal and Local Rules of Motion Practice; analyzed City's new Supplemental Memorandum for compliance with the Rules;	2.5
9-2-06	Reviewed Judge Wolf's decision of Plaintiff's request for de novo review	0.75
9-3-06	Preliminary research on res judicata and collateral estoppel; preliminary research on the use and effect of state administrative decisions in federal courts; analyzed these concepts as a way to respond to the Judge's order	2.5
9-5-06	Examined Judge Wolf's Memorandum and Order; examined comments by Magistrate when Plaintiff withdrew Sec 1292(b)	

	request;	1.5
9-4-06	Compared Rooker v Fidelity Trust Co and DC Court of Appeals v Feldman; analyzed the application of res judicata and collateral estoppel to these cases	2.5
9-6-06	Compared Rooker-Feldman and the new Supreme Court case of Exxon-Mobil v Saudi Basic Industries Corp; analyzed the narrowed Scope of the doctrine; also examined case for applicability to Plaintiff's case	2.5
9-8-06	Compared Verizon Maryland Inc. v Public Service Commission of Maryland with the principle of Rooker-Feldman; compared the executive action of Verizon with the administrative action of Plaintiff's case; examined the use of preclusion in Verizon	2.5
9-10-06	Reviewed the enabling statutes of DALA & PERAC; reviewed the regulations 840 CMR 1:00 et seq. that govern agencies; examined regulations for their adjudicatory provisions;	1.5
9-11-06	Researched basic principles of Res Judicata and Collateral Estoppel in Mass Practice-Administrative Law	2.1
9-11-06	Researched finality of administrative judgments in Restatement of Law Second, Judgments 2d(1982)	1.5
9-12-06	Researched US v Utah Construction and Mining;	1.5
9-13-06	Researched SJC and Mass Appeals Court application of the doctrine of res judicata and collateral estoppel as applied to DALA and PERAC decisions	2.5
9-14-06	Reviewed facts of Almeida v Travelers Insurance; identified SJC use of res judicata and collateral estoppel for decision by Administrative agency	2.5
9-14-06	Researched Corrigan v General Electric	1.5
9-15-06	Researched IAB cases; performed detailed analysis of Martin v Ring; identified and selected quotations	1.5
9-16-06	Performed general review of the application of res judicata and collateral estoppel by the SJC; conducted overview of Almeida, Corrigan and Martin	1.5

9-17-06	Performed general overview of the application of the doctrine of res judicata and collateral estoppel by the Mass App Ct.	2.5
9-17-06	Researched Morganelli, Conservation Commission v Pacheco Green v Town of Brookline	2.5
9-18-06	Identified preclusive effect of DIA decisions as applied by Mass App Ct;	1.5
9-18-06	Reviewed Mass App Ct cases: Van Munching Co v Alcohol Bev Control Comm, Patterson v Liberty Mutual Ins. Co.	2.5
9-19-06	Detailed review of Box Pond Association v Energy Facilities Siting Board, Anderson Insulation Co v Dept of Public Health; Prepared section of Brief	2.5
9-19-06	Reviewed enabling statutes of CRAB, DALA, and PERAC; reviewed G.L.c.7 § 4H and § 49; reviewed M.G.L.c. 32 § 16(4) reviewed regulations 801 CMR 1:00 et seq.; evaluated adjudicatory provisions	1.5
9-20-06	Reviewed holdings of Horgan, Queenan and McCarthy; analyzed implications for administrative law in state courts	2.5
9-20-06	Reviewed holdings of Namay, Quincy Retirement Board, Retirement Board of Revere; analyzed implications for the preclusive effect of retirement system decisions	2.5
9-21-06	Researched prior Motions To Compel Thomas Ambrosino and Terrence Reardon to Answer Interrogatories ordered by court; reviewed prior conduct of Defendants; reviewed prior exhibits and history contained in the Notices and Certificates of Consultation	2.5
9-21-06	Reviewed Court's original order; prepared Motion to Compel Defendants to Answer Interrogatories; prepared Exhibits in Support of Motion; examined obdurate nature of Defendants Resistance	2.5
9-22-06	Researched federal recognition of state preclusion; analyzed the holding of US v Utah Construction; examined the case for the preclusive effect of state administrative decisions in federal courts	2.5
9-22-06	Reviewed treatises Mass Practice, Restatement of Law, Judgments; researched treatises for history and case law supporting	

	the recognition by federal courts of state administrative adjudications	2.5
9-23-06	Reviewed research on brief; researched US Supreme Court cases Univ of Tenn v Elliot and Kremer v Chemical Construction Corp	1.5
9-23-06	Reviewed treatise on administrative law by Charles Kach; examined the effect of failure to appeal administrative decisions; also reviewed Misischia v Pirie; recognition that failure to appeal triggered preclusive appeal	2.5
9-25-06	Researched Restatement of Law: Judgments 2d § 41; researched State of Montana v US; incorporated principles into brief	1.5
9-25-06	Researched and reviewed the governing law in Massachusetts on the preclusive effect of administrative adjudicatory decisions; identified Morganelli, Stigmatine Fathers and Jamaica Pond Aqueduct Corp v Chandler; prepared final draft of brief	3.0
9-28-06	Filed with court previously prepared Motion To Compel Defendants, Reardon and Ambrosino To Answer Interrogatories, reviewed all previous filings; examined repeated conduct Of the Defendants; documented the pattern of their conduct in Prior responses; prepared Memorandum in support of Motion To compel	2.75
10-4-06	Reviewed court's ruling on Defendants Cross Motion for Judgment on the Pleadings; also Defendants Motion for Partial Summary Judgment	0.75
10-5-06	Reviewed Defendants Joint Motion to Compel & Affidavit of Walter Porr; analyzed motion and reviewed Affidavit of Walter Porr;	1.5
10-20-06	Reviewed Judge's Order on Defendant's Motion; prepared preliminary draft of new Motion To Compel; utilized format that included original questions, responses, supplemental responses; prepared draft for both Defendants;	4.5
10-21-06	Reviewed prior Motions and Answers provided by Defendants; selected the questions and responses suitable for use in preparing the document ordered by the court.	2.5
10-21-06	Prepared the Interrogatories using the format ordered by the court for Thomas Ambrosino	2.5

10-21-06	Prepared the Interrogatories using the format ordered by the court for Terrence Reardon	2.5
10-22-06	Review of documents to be used at hearing on 11-2-06;	1.5
10-23-06	Reviewed Docket No: 250; reviewed No: 234; reviewed exhibits and other relevant materials	1.5
10-23-06	Prepared and filed Brief: Massachusetts Administrative Determinations In Federal Court: The Application of Res Judicata And Collateral Estoppel	0.75
11-1-06	Filed Interrogatories to both Defendants in the format ordered by the court	0.75
11-2-06	Attended hearing scheduled by court; discussed pleadings with new counsel; addressed court on issues of mediation; attended court review of trial by magistrate	1.5
11-3-06	Reviewed outcome of hearing; discussed with new counsel the receipt of appropriate documents in response to Plaintiffs request.	0.75
11-4-06	Preliminary preparations for conference on mediation	2.5
1-19-07	Prepared and conducted mediation conference with opposing counsel; filed motion to withdraw requested by Plaintiff	3.5
1-22-07	Reviewed electronic notice of hearing on motion to withdraw set for 2-6-07; prepared memorandum and Exhibits that accompanied Affidavit of Explanation	1.5
1-22-07	Prepared affidavit of explanation	1.5
1-23-07	Prepared detailed accounting of attorneys time expended on Plaintiff's case and attached as exhibit to Affidavit	7.5
1-24-07	Prepared history of non-conforming motions filed by Defendants and attached as exhibit to Affidavit	7.5
2-6-07	Attended hearing on 2-6-07; confirmed with court that Counsel had agreed to withdraw from representation As Plaintiff had requested	4.5

SERVICES ABOVE PROVIDED AT STANDARD RATE

EXPENSES

Constable Roscoe	\$70.00
Sheriff's Fee	\$44.00
Parking	\$1.00
Sheriff's Fee	\$220.52
Deposition-McCarthy	\$423.00
Photocopying expense	\$ 6.00
Parking	\$9.00
Tolls	\$5.60
Tolls	\$5.60
McCarthy Reporting	\$ 1000.00
Priority Mail	\$8.27
McCarthy Reporting	\$1000.00
McCarthy Reporting	\$1000.00

